

1 MONIQUE C. WINKLER (Cal. Bar No. 213031)
winklerm@sec.gov
2 MARC D. KATZ (Cal. Bar No. 189534)
katzma@sec.gov
3 ERIN E. WILK (Cal. Bar No. 310214)
wilke@sec.gov

4 Attorneys for Plaintiff
5 SECURITIES AND EXCHANGE COMMISSION
44 Montgomery Street, Suite 700
6 San Francisco, CA 94104
(415) 705-2500 (Telephone)
7 (415) 705-2501 (Facsimile)

8
9
10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
14

15 SECURITIES AND EXCHANGE COMMISSION,

16 Plaintiff,

17 vs.

18 HARI PRASAD SURE,
LOKESH LAGUDU,
19 CHOTU PRABHU TEJ PULAGAM,
DILEEP KUMAR REDDY KAMUJULA,
20 SAI MOUNIKA NEKKALAPUDI,
ABHISHEK DHARMAPURIKAR, and
21 CHETAN PRABHU SREE KARTEEK PULAGAM,

22 Defendants.
23
24
25
26
27
28

Case No. 4:22-cv-01967-JST

**~~PROPOSED~~ FINAL
JUDGMENT AS TO
DEFENDANT CHETAN
PRABHU SREE KARTEEK
PULAGAM**

The Securities and Exchange Commission having filed a Complaint, and Defendant Chetan Prabhu Sree Karteek Pulagam (“Defendant”) having entered a general appearance; consented to the Court’s jurisdiction over Defendant and the subject matter of this action; consented to entry of this Final Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction and except as otherwise provided herein in paragraph III); waived findings of fact and conclusions of law; and waived any right to appeal from this Final Judgment:

I.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that Defendant is permanently restrained and enjoined from violating, directly or indirectly, Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78j(b)] and Rule 10b-5 promulgated thereunder [17 C.F.R. § 240.10b-5], by using any means or instrumentality of interstate commerce, or of the mails, or of any facility of any national securities exchange, in connection with the purchase or sale of any security:

- (a) to employ any device, scheme, or artifice to defraud;
- (b) to make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading; or
- (c) to engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this Final Judgment by personal service or otherwise: (a) Defendant’s officers, agents, servants, employees, and attorneys; and (b) other persons in active concert or participation with Defendant or with anyone described in (a).

II.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is liable for disgorgement of \$27,960.00, representing net profits gained as a result of the conduct alleged in the Complaint, together with prejudgment interest thereon in the amount of

1 \$1,546.67, for a total of \$29,506.67. The Court finds that sending the disgorged funds to the
 2 United States Treasury, as ordered below, is consistent with equitable principles. The Court
 3 further imposes a civil penalty in the amount of \$27,960.00, pursuant to Section 21A of the
 4 Exchange Act [15 U.S.C. § 78u-1]. Defendant shall satisfy these obligations by paying
 5 \$57,466.67 to the Securities and Exchange Commission within 30 days after entry of this Final
 6 Judgment.

7 Defendant may transmit payment electronically to the Commission, which will provide
 8 detailed ACH transfer/Fedwire instructions upon request. Payment may also be made directly
 9 from a bank account via Pay.gov through the SEC website at
 10 <http://www.sec.gov/about/offices/ofm.htm>. Defendant may also pay by certified check, bank
 11 cashier's check, or United States postal money order payable to the Securities and Exchange
 12 Commission, which shall be delivered or mailed to

13 Enterprise Services Center
 14 Accounts Receivable Branch
 15 6500 South MacArthur Boulevard
 Oklahoma City, OK 73169

16 and shall be accompanied by a letter identifying: (1) the case title, civil action number, and
 17 name of this Court; (2) Chetan Prabhu Sree Kartee Pulagam as a defendant in this action; and
 18 (3) specifying that payment is made pursuant to this Final Judgment.

19 Defendant shall simultaneously transmit photocopies of evidence of payment and case
 20 identifying information to the Commission's counsel in this action. By making this payment,
 21 Defendant relinquishes all legal and equitable right, title, and interest in such funds and no part
 22 of the funds shall be returned to Defendant. The Commission shall send the funds paid pursuant
 23 to this Final Judgment to the United States Treasury.

24 The Commission may enforce the Court's judgment for disgorgement and prejudgment
 25 interest by using all collection procedures authorized by law, including, but not limited to,
 26 moving for civil contempt at any time after 30 days following entry of this Final Judgment. The
 27 Commission may enforce the Court's judgment for penalties by the use of all collection
 28 procedures authorized by law, including the Federal Debt Collection Procedures Act, 28 U.S.C.

§ 3001 *et seq.*, and moving for civil contempt for the violation of any Court orders issued in this action.

Defendant shall pay post judgment interest on any amounts due after 30 days of the entry of this Final Judgment, pursuant to 28 U.S.C. § 1961.

III.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, solely for purposes of exceptions to discharge set forth in Section 523 of the Bankruptcy Code, 11 U.S.C. § 523, the allegations in the complaint are true and admitted by Defendant, and further, any debt for disgorgement, prejudgment interest, civil penalty or other amounts due by Defendant under this Final Judgment or any other judgment, order, consent order, decree or settlement agreement entered in connection with this proceeding, is a debt for the violation by Defendant of the federal securities laws or any regulation or order issued under such laws, as set forth in Section 523(a)(19) of the Bankruptcy Code, 11 U.S.C. § 523(a)(19).

IV.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that the Consent is incorporated herein with the same force and effect as if fully set forth herein, and that Defendant shall comply with all of the undertakings and agreements set forth therein.

V.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

VI.

There being no just reason for delay, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, the Clerk is ordered to enter this Final Judgment as to Defendant Chetan Prabhu Sree Karteek Pulagam forthwith and without further notice.

DATED: January 9, 2025


 Hon. Jon S. Tigar
 UNITED STATES DISTRICT JUDGE